

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREGORY PAPADOPOULOS,	:	CIVIL ACTION NO. 08CV00989
	:	
Plaintiff,	:	
	:	
V.	:	
	:	
TENET GOOD SAMARITAN INC.,	:	
	:	
	:	NOTICE OF DEFENDANT'S
Defendant.	:	MOTION TO DISMISS

PLEASE TAKE NOTICE that the Defendant, Tenet Good Samaritan, Inc. ("Good Samaritan"), shall move this Court before the Honorable Denise Cote at the Daniel Patrick Moynihan United States Court House, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order dismissing this action for lack of personal jurisdiction and/or dismissing Plaintiff's claims for failing to state a claim upon which relief can be granted.

This motion is made pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, and it is based on the points and authorities set forth in the accompanying Memorandum of Law In Support Of Defendant's Motion To Dismiss, the Affidavit of Douglas E. Rabe, and any pleadings that have already been filed with the Court.

Pursuant to Judge Cote's Order, the Plaintiff's opposition papers shall be filed with the Court on or before July 11, 2008, and the Defendant's reply, if any, shall be filed on or before July 25, 2008.

DATED JUNE 6, 2008

Respectfully Submitted,

THE DEFENDANT
TENET GOOD SAMARITAN, INC.

By: 
Jonathan D. Elliot

ZELDES, NEEDLE & COOPER, P.C.
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Bridgeport, CT 06604
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Its Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing has been sent via U.S. Mail first-class mail, postage prepaid, on this date, to:

Gregory Papadopoulos
800 5th Avenue, Apt. 14B
New York, NY 10065

Dated at Bridgeport, Connecticut on this 6th day of June 2008.

A handwritten signature in black ink, appearing to read "Jonathan D. Elliot", written over a horizontal line.

Jonathan D. Elliot